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11 **Attorneys for Plaintiffs**

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13 UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA

15 SACRAMENTO DIVISION

16 AT LAW AND IN ADMIRALTY

17 **DENNIS C. PAYNE and SUSAN  
PAYNE,**

18 Case No. 2:20-cv-01198-MCE-AC

19 Plaintiffs,  
vs.

20 **NOTICE OF TAKING VIDEOTAPED  
DEPOSITION OF PLAINTIFF  
DENNIS C. PAYNE**

21 **ABB, INC. (sued individually and as  
successor-in-interest to BAILEY  
METER CO.), et al.**

22 Date: November 10, 2020  
Time: 10:00 a.m.  
Location: **Via Video-Conferencing only.**  
**Contact: (214) 347-4781,  
For assistance**

23 Defendants.

24 Action Filed: September 4, 2020  
Trial Date: None Set

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**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that the discovery deposition of the following-described person will be taken pursuant to the Federal Rules of Civil Procedure and other applicable rules and statutes; that said deposition will be taken before a Notary Public and certified Shorthand Reporter, or any other office authorized by law to take depositions in like cases.

**WITNESS:**

## Dennis C. Payne

DATE:

November 10, 2020

**TIME:**

**10:00 a.m. (local time)**

**PLACE:**

**Via Video-Conferencing only.  
Contact: (214) 347-4781, for assistance**

## COURT REPORTER:

**Asbestos Reporters, a GPS Partnership**  
**Email: [mcard@asbestosreporters.com](mailto:mcard@asbestosreporters.com)**  
**Tel: (214) 347-4781**

This oral examination will be subject to continuance or adjournment from day to day (excluding weekends and holidays) or place to place until completed.

DATED: September 24, 2020

FROST LAW FIRM, PC

By: /s/ Andrew Seitz

ANDREW SEITZ

Attorneys for Plaintiff

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2                   **CERTIFICATE OF SERVICE**  
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4  
5                   I declare that I am over the age of 18, not a party to the above-entitled action, and  
6                   am an employee of Frost Law Firm, PC whose business address is 273 West 7<sup>th</sup> Street,  
7                   San Pedro, CA 90731.  
8

9                   On September 24, 2020, I served the following document in the following manner:  
10

11                   **NOTICE OF TAKING VIDEO TAPE DEPOSITION OF PLAINTIFF DENNIS  
12                   C. PAYNE**  
13

- 14                    (CM/ECF System) Pursuant to Local Rule, I electronically filed the documents  
15                   with the Clerk of the Court using the CM/ECF systems, to the parties and/or  
16                   counsel who are registered CM/ECF Users set forth in the service list that is  
17                   located on the PACER website.  
18  
19                    (Federal) I declare that I am employed in the office of a member of the Bar of this  
20                   Court at whose direction the service was made.  
21

22                   Executed on September 24, 2020, San Pedro, California.  
23

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25                   \_\_\_\_\_  
26                   /s/ *Kimberly Manalansan*  
27                   KIMBERLY MANALANSAN  
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